

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PARTNER REINSURANCE COMPANY LTD.,

Plaintiff,

v.

RPM MORTGAGE, INC., LENDUS, LLC, ERWIN
ROBERT HIRT, TRACEY HIRT, and THE ROBERT
HIRT AND TRACEY NAJARIAN HIRT REVOCABLE
LIVING TRUST,

Defendants.

Case No.: 1:18-cv-05831

**[PROPOSED] SCHEDULING
ORDER**

This [Proposed] Scheduling Order is submitted by Plaintiff. Plaintiff proposes that the case proceed as follows:

Event	Deadline
Submission of Plaintiff's letter brief seeking permission to take 30(b)(6) deposition of LendUS, LLC and any letter brief by Defendants seeking permission to take further depositions in light of Court's ruling on motion to amend	November 23, 2020
Submission of any response letter briefs	November 30, 2020
Disclosure of identity of Plaintiff's testifying experts and general subject matter of testimony	November 30, 2020
Disclosure of identify of Defendants' rebuttal experts and general subject matter of testimony	December 14, 2020
Within three (3) business days after ruling from the Court on request(s) for additional fact depositions or 21 days after Court's ruling on the ODI's motion to quash, whichever comes later, parties to submit revised scheduling order reflecting the below dates:	
Fact discovery cutoff	21 days after a ruling from the Court on request(s) for additional fact depositions or 21 days after the Court's ruling on the ODI's motion to quash, whichever comes later
Plaintiff's service of opening expert reports	7 days after fact discovery cutoff
Defendants' service of rebuttal expert reports	28 days after fact discovery cutoff

Expert discovery cutoff	30 days after Defendants' service of rebuttal expert reports
Pre-motion letter(s) regarding proposed summary judgment motion(s)	7 days after expert discovery cutoff
Response(s) to pre-motion letter(s) regarding proposed summary judgment motion(s)	14 days after expert discovery cutoff

Dated: November 18, 2020

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/s/ Nathan Holcomb

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Counsel for Plaintiff

TO BE COMPLETED BY THE COURT:

The Proposed Order has been reviewed by the Court and, except as modified, is adopted as the Scheduling Order of this Court.

This ORDER may not be modified or the dates herein extended, except as permitted herein or by further Order of this Court for good cause shown. Any application to modify or extend the dates herein shall be made in a written application in accordance with paragraph 1.E of the Court's

Individual Rules and Practices and shall be made no less than two (2) business days prior to the expiration of the date sought to be extended.

The next Case Management Conference is scheduled for _____ at _____.

SO ORDERED.

DATED: _____

Hon. Paul A. Engelmayer, U.S.D.J.